

We thank the Department of Homeland Security for this opportunity to address this very important issue.

First, we believe that a requirement for a "Security Plan" including methodologies used, layered approaches to specific threats, and determination of effectiveness are excellent steps.

Second, the idea of improving tank car integrity and security are effective steps in spill control from a terrorist situation or accidental spill.

Third, however we believe that the elimination of placarding of tank cars will put first responders at great risk. The idea of calling a company at two in the morning and getting a live body to describe the materials thousands of miles away seems untenable. The risk versus gain of putting firefighters lives at risk daily to protect against a limited threat seems premature. In two California incidents, the Dunsmire and the Ventura Seacliff incidents, hazard classification of the exact materials even with shipping papers and placarding were time consuming and tedious given the conditions of the tank cars. A derailment is a situation where the cars are hard to identify even with the waybills and consist. Many times cars are added and subtracted from the train making good identification almost impossible. TIH materials make this matter all the more important and dangerous.

In conclusion, the practical application of removal of placards to an automated inventory mechanism run by the industry will put firefighters and first responders at great risk on a daily basis. The risk versus gain of hurting firefighters daily to protect against a terrorist threat is a known quantity that should be avoided.

Thank you for this opportunity.

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